

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: ASBESTOS PRODUCTS LIABILITY	:	CIVIL ACTION NO. MDL-875
LITIGATION (NO. VI)	:	Becnel 2:08-cv-84556-ER

This Document Relates to:

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

Becnel, Gayle, *et al.*

v.

Anco Insulations, Inc., *et al.*

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Civil Action No. 3:07-cv-315-FJP-DLD

STATEMENT OF UNCONTESTED MATERIAL FACTS

Northrop Grumman Ship Systems, Inc., formerly known as Avondale Industries, Inc. (n/k/a Northrop Grumman Shipbuilding, Inc.) (“Avondale”), submits the following Statement of Uncontested Material Facts for the sole purpose of supporting, and in connection with, its Motion for Summary Judgment:

1. Avondale Shipyards, Inc. n/k/a Northrop Gunman Shipbuilding, Inc. is and has always been adjacent to the navigable waters of the United States of America. *See* Affidavit of Albert L. Bossier, Jr.
2. Avondale Shipyards, Inc., n/k/a Northrop Grumman Shipbuilding, Inc., is and has always been in the business of constructing and/or repairing marine vessels. *See* Affidavit of Albert L. Bossier, Jr.
3. While employed at Avondale, Carl Becnel, Sr.’s work was related to the construction and/or repair of marine vessels. *See*, Affidavit of Albert L. Bossier, Jr.

Respectfully Submitted:

/s/ Edwin A. Ellinghausen, III

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Northrop Grumman Shipbuilding, Inc.)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on all counsel of record by facsimile, by email by placing copy of the same in the U.S. mail, postage pre-paid and properly addressed, this 29th day of November, 2010.

/s/ Edwin A. Ellinghausen, III
